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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

11 MOHAMMAD SARABRI, Individually and ) Civil No.10cv1777 AJB (NLS)  
12 on Behalf of All Others Similarly Situated, )  
13 Plaintiff, ) STIPULATED ORDER FOR  
14 v. ) INJUNCTION  
15 WELTMAN, WEINBERG & REIS CO., ) AND INJUNCTION  
16 L.P.A., )  
Defendants. )

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17 Plaintiff Mohammed Sarabri and Defendant Weltman, Weinberg & Reis Co, L.P. ("Weltman")  
18 jointly submit this Stipulated Injunction (hereinafter referred to as the "Stipulated Injunction"). For  
19 purposes of this Stipulated Injunction, Plaintiff and Weltman (collectively, the "Parties") agree upon the  
20 following predicate procedural history and facts:

21 A. On August 25, 2010, Plaintiff filed this class action lawsuit (hereinafter referred to as the  
22 "Lawsuit") against Weltman asserting class claims under the Telephone Consumer Protection Act  
23 (hereinafter referred to as the "TCPA"), 47 U.S.C. § 227.

24 B. Specifically, Plaintiff alleged that Weltman violated the TCPA by calling his cellular  
25 telephone, without "prior express consent," using an "automatic telephone dialing system" and using an  
26 "artificial or prerecorded voice."

27 C. Weltman denied any and all liability asserted in the Lawsuit.  
28

1 D. Following extensive settlement discussions and mediation, the Parties reached a  
2 settlement. The final settlement is set forth in the Parties' Class Action Settlement Agreement.

3 E. Weltman, without admitting any liability as to any of the allegations, acknowledges that  
4 Plaintiff's claims are the sole catalyst for entering into this Stipulated Injunction.

5 WHEREFORE, IT IS HEREBY STIPULATED, by and between the Parties, that the following  
6 injunction be entered by the Court without further notice or process:

7 1. Verification that Numbers Called Are Not Cellular Telephone Numbers - Weltman shall  
8 use procedures now and in the future to verify whether a number called is a cellular telephone number  
9 before calling such number by an automatic telephone dialing system, or with a prerecording voice  
10 message. That shall be done by "scrubbing" such lists of potential numbers, that is, comparing such  
11 numbers to be called to commercially available lists of known cell phone numbers, or by any such other  
12 commercially feasible manner to achieve the same result. If any such telephone number is determined  
13 to be a cell phone number, Weltman agrees that it will not call such number by an automatic telephone  
14 dialing system or with a prerecorded voice message, as prohibited by 47 U.S.C. § 227 et seq., unless it  
15 has evidence of prior express consent to make the call.

16 2. Duration of Injunction - The Stipulated Injunction will lapse and expire twelve (12)  
17 months after the Effective Date.

18 3. Change In Applicable or Relevant Law - Weltman has the right to seek relief from this  
19 Court in any manner available to limit, eliminate, or modify or annul the obligations set forth in this  
20 Stipulated Injunction based upon a change in the relevant or applicable state or federal law.

21  
22 IT IS SO STIPULATED.

23 Dated: February 11, 2013

HYDE & SWIGART

24 /s/Joshua Swigart  
Joshua Swigart, Esq.  
25 Attorney for Mohammad Sarabri

26 Dated: February 11, 2013

KAZEROUNIAN LAW GROUP

27 /s/Abbas Kazerounian  
28 Abbas Kazerounian, Esq.  
Attorney for Mohammad Sarabri

1 Dated: February 11, 2013

LAW OFFICES OF DOUGLAS CAMPION

2 /s/Douglas Campion  
3 Douglas Campion, Esq.  
4 Attorney for Mohammad Sarabri


5 Dated: February 11, 2013

LEWIS BRISBOIS BISGAARD & SMITH, LLP

6 /s/Tim J. Vanden Heuvel  
7 Tim J. Vanden Heuvel, Esq.  
8 Stephen H. Turner, Esq.  
9 Attorney Weltman, Weinberg, & Reis Co., LLP

10 IT IS SO ORDERED:

11 DATED: February 14, 2013

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13 Hon. Anthony J. Battaglia  
14 U.S. District Judge  
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